

FOR THE DISTRICT OF NEW JERSEY

TYSHON EDWARDS,

Plaintiff,

CASE NO. 3:24-cv-06029

V.

CERTAIN UNDERWRITERS AT
LLOYD'S, LONDON SUBSCRIBING TO
POLICY NO. PK1021618, LLOYD'S
SYNDICATE 2987,

Defendants.

STIPULATION TO ADJOURN MOTION DAY AND EXTEND BRIEFING SCHEDULE

Plaintiff, Tyshon Edwards, and Defendant, Certain Underwriters at Lloyd's, London
Subscribing to Policy No. PK1021612, Lloyd's Syndicate 2987, respectfully submit this stipulation
for the Court's review and approval and state as follows:

1. Plaintiff filed his Complaint on May 13, 2024. *See* Dkt. 1.
2. At Defendant's request, Plaintiff agreed to four weeks-worth of extensions for Defendant to respond to Plaintiff's Complaint. *See* Dkts. 6–9.
3. On July 2, 2024, Defendant filed a motion to compel arbitration, with a motion day of August 5, 2024. *See* Dkt. 10.
4. Plaintiff and Defendant have engaged in active discussions regarding this matter.
5. Plaintiff and Defendant stipulate and request that the Court adjourn the motion day on Defendant's motion to compel arbitration to September 3, 2024, and that the deadlines for Plaintiff's opposition brief and Defendant's reply brief related to the motion be automatically extended pursuant to Local Civil Rules 7.1 and 78.1.
6. This adjournment and related extensions are not sought for purposes of delay, but so that justice may be done.

WHEREFORE, Plaintiff and Defendant respectfully request that the Court enter this Stipulation, adjourning the motion day for Defendant's motion to compel arbitration to September 3, 2024, and automatically extending Plaintiff's opposition brief and Defendant's reply brief pursuant to Local Civil Rules 7.1 and 78.1.

Respectfully submitted,

/s/ Brian H. Leinhauser

BRIAN H. LEINHAUSER

ID 038102006

Email: bleinhauser@macmainlaw.com

MACMAIN LEINHAUSER

433 W. Market Street

Suite 200

West Chester, PA 19382

(484) 318-7106

ATTORNEY FOR CERTAIN
UNDERWRITERS AT LLOYD'S,
LONDON, SUBSCRIBING TO POLICY
NO. PK1021612, LLOYD'S SYNDICATE
2987

/s/ John S. Stapleton

JOHN S. STAPLETON

ID 032622005

Email: jstapleton@levanstapleton.com

LEVAN STAPLETON SEGAL

COCHRAN LLC

Four Greentree Centre

601 Route 73 N, Suite 303

Marlton, NJ 08053

Telephone: (856) 259-3300

ATTORNEY FOR PLAINTIFF TYSHON
EDWARDS

SO ORDERED this _____ day of _____, 2024

, J.